

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, et al.,

Plaintiffs,

v.

BRIAN KEMP, et al.,

Defendants.

CIVIL ACTION FILE

NO. 1:17-CV-02989-AT

**THE STATE DEFENDANTS’  
MOTION TO FILE A BRIEF IN EXCESS OF TWENTY-FIVE PAGES**

State Defendants Secretary of State Brian P. Kemp, State Election Board, State Election Board Members David J. Worley, Rebecca N. Sullivan, Ralph F. Simpson and Seth Harp, and Merle King (collectively the “State Defendants”) respectfully request leave to file a Brief in excess of the twenty-five (25) page limit set forth in Local Rule 7.1(D). In support of this Motion, the State Defendants show this Court as follows:

1. The Coalition Plaintiffs and the Curling Plaintiffs have both filed Motions For Preliminary Injunction including numerous Declarations and materials. Doc. 258 (totaling 369 pages) & Doc. 260 (exceeding 100 pages). The State Defendants are filing a single and collective briefing responding to

both the Curling Plaintiffs' and the Coalition Plaintiffs' Motions for Preliminary Injunction.

2. The State Defendants, therefore, request that they be given a 5-page extension of the page limit for briefs (allowing the filing of a brief not to exceed 30 pages) so that they can adequately address the legal and factual arguments regarding the important issues raised therein.

3. A proposed Order is attached for the Court's convenience.

For the foregoing reasons, the State Defendants respectfully request that this Court grant their Motion to File a Brief in Excess of Twenty-Five Pages.

This 14<sup>th</sup> day of August, 2018.

**BARNES LAW GROUP, LLC**

/s/ John F. Salter

**JOHN F. SALTER**

Georgia Bar No. 623325

**ROY E. BARNES**

Georgia Bar No. 039000

**BARNES LAW GROUP, LLC**

31 Atlanta Street

Marietta, GA 30060

(770) 227-6375

(770) 227-6373 (fax)

[john@barneslawgroup.com](mailto:john@barneslawgroup.com)

[roy@barneslawgroup.com](mailto:roy@barneslawgroup.com)

*Attorneys for Defendants Brian P. Kemp, David J. Worley, Rebecca N. Sullivan, Ralph F. "Rusty" Simpson, Seth Harp, & The State Election Board*

**CERTIFICATE OF COMPLIANCE**

I hereby certify that I have read the Court's Standing Order in Cases Proceedings Before the Honorable Amy Totenberg and that I will comply with its provisions during the pendency of this litigation.

/s/John F. Salter

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Century Schoolbook and a point size of 13.

/s/John F. Salter

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I have electronically filed the foregoing **THE STATE DEFENDANTS' MOTION TO FILE A BRIEF IN EXCESS OF TWENTY-FIVE PAGES** with the Clerk of Court using the CM/ECF system, which will send email notification of such filing to all attorneys of record.

This 14<sup>th</sup> day of August, 2018.

**BARNES LAW GROUP, LLC**

*/s/ John F. Salter*

**JOHN F. SALTER**

Georgia Bar No. 623325

**ROY E. BARNES**

Georgia Bar No. 039000

**BARNES LAW GROUP, LLC**

31 Atlanta Street

Marietta, GA 30060

(770) 227-6375

(770) 227-6373 (fax)

[john@barneslawgroup.com](mailto:john@barneslawgroup.com)

[roy@barneslawgroup.com](mailto:roy@barneslawgroup.com)

*Attorneys for Defendants Brian P. Kemp, David J. Worley, Rebecca N. Sullivan, Ralph F. "Rusty" Simpson, Seth Harp, & The State Election Board*